

From: [Hughes, Hayley](#)
To: [laura.carolyn.green](#) Ex. 6 Personal Privacy
Cc: [Steven Knott \(Knott.Steven@epa.gov\)](#)
Subject: RE: Clarification of your roles as an EPA Special Government Employee
Date: Wednesday, December 15, 2021 4:47:00 PM

Dear Dr. Green,

Thank you for your email and questions. I apologize for the delay in getting back to you.

The EPA learned that you referred to yourself as a “part-time employee” of the EPA. As the Deputy Ethics Official for the Office of Program Support, Office of Chemical Safety and Pollution Prevention, I provided you guidance on how to more accurately refer to your EPA Special Government Employee position. This guidance is also provided in the SGE ethics training and reminders are provided to SGEs on request and when we become aware of questions or confusion regarding references to SGE status. If you have questions regarding ethics guidance, please let me know.

For any other concerns that you may have about the EPA’s processes, please contact the Office of Inspector General Hotline:

<https://www.epa.gov/office-inspector-general/forms/epa-oig-hotline-complaint-form>

Sincerely,
Hayley

Hayley Hughes, DrPH, MPH, CSP
Director, Office of Program Support
Deputy Ethics Official, Office of Program Support
Office of Chemical Safety and Pollution Prevention
US Environmental Protection Agency

Desk: 202.564.1116
Email: Hughes.hayley@epa.gov

From: Laura Green <laura.carolyn.green> Ex. 6 Personal Privacy
Sent: Wednesday, December 15, 2021 12:46 PM
To: Hughes, Hayley <hughes.hayley@epa.gov>
Cc: Knott, Steven <Knott.Steven@epa.gov>; Kenneth Portier <kenneth.portier> Ex. 6 Personal Privacy Gibson, Tamue <Gibson.Tamue@epa.gov>; Edmund Crouch <crouch@greentoxiology.com>; Steven R. Tannenbaum <srt@mit.edu>; William G Thilly <thilly@mit.edu>; Kenny Crump <kennycrump> Ex. 6 Personal Privacy James V Bruckner <bruckner@uga.edu>
Subject: Re: Clarification of your roles as an EPA Special Government Employee

Dear Dr. Hughes,

Ex. 6 Personal Privacy

Ex. 6 Personal Privacy

Laura C. Green, Ph.D., D.A.B.T.
President & Senior Toxicologist
Green Toxicology LLC

315 Beach Avenue, Hull, Massachusetts 02045
www.GreenToxicology.com

Ex. 6 Personal Privacy (cell)

On Wed, Dec 15, 2021 at 5:36 AM Laura Green <laura.carolyn.green> Ex. 6 Personal Privacy wrote:

Ex. 6 Personal Privacy

Laura C. Green, Ph.D., D.A.B.T.
President & Senior Toxicologist
Green Toxicology LLC

315 Beach Avenue, Hull, Massachusetts 02045
www.GreenToxicology.com

Ex. 6 Personal Privacy (cell)

On Tue, Dec 7, 2021 at 4:04 PM Hughes, Hayley <hughes.hayley@epa.gov> wrote:

Hello Dr. Green,

I am sorry that I missed your call. I got your voicemail and will get back to you soon.

Thank you,
Hayley

Hayley Hughes, DrPH, MPH, CSP
Director, Office of Program Support
Deputy Ethics Official, Office of Program Support
Office of Chemical Safety and Pollution Prevention
US Environmental Protection Agency

Desk: 202.564.1116
Email: Hughes.hayley@epa.gov

From: Laura Green <laura.carolyn.green> Ex. 6 Personal Privacy
Sent: Tuesday, December 7, 2021 9:10 AM
To: Hughes, Hayley <hughes.hayley@epa.gov>
Cc: Knott, Steven <Knott.Steven@epa.gov>
Subject: Re: Clarification of your roles as an EPA Special Government Employee

Ex. 6 Personal Privacy

Laura C. Green, Ph.D., D.A.B.T.
President & Senior Toxicologist
Green Toxicology LLC

315 Beach Avenue, Hull, Massachusetts 02045
www.GreenToxicology.com

Ex. 6 Personal Privacy (cell)

On Tue, Dec 7, 2021 at 9:06 AM Hughes, Hayley <hughes.hayley@epa.gov> wrote:

Good morning Dr. Green,

Thank you for your email. I appreciate your concern and questions.

I respectfully request your support and encourage you to be mindful of the limitations of your SGE position as outlined in my previous email. To reduce confusion going forward, as an SGE, it is more precise to indicate that you work on an intermittent basis with an EPA Federal Advisory Committee rather than state that you are a “part-time” or “special” EPA employee.

Please let me know if you have further questions.

Sincerely,
Hayley

Hayley Hughes, DrPH, MPH, CSP
Director, Office of Program Support
Deputy Ethics Official, Office of Program Support
Office of Chemical Safety and Pollution Prevention
US Environmental Protection Agency

Desk: 202.564.1116

Email: Hughes.hayley@epa.gov

From: Laura Green <laura.carolyn.green> Ex. 6 Personal Privacy

Sent: Monday, December 6, 2021 4:55 PM

To: Hughes, Hayley <hughes.hayley@epa.gov>

Cc: Knott, Steven <Knott.Steven@epa.gov>

Subject: Re: Clarification of your roles as an EPA Special Government Employee

Ex. 6 Personal Privacy

Laura C. Green, Ph.D., D.A.B.T.

President & Senior Toxicologist
Green Toxicology LLC

315 Beach Avenue, Hull, Massachusetts 02045
www.GreenToxicology.com

Ex. 6 Personal Privacy (cell)

On Mon, Dec 6, 2021 at 4:23 PM Hughes, Hayley <hughes.hayley@epa.gov> wrote:

Dear Dr. Green,

Thank you for your service as a Special Government Employee (SGE) to the Environmental Protection Agency's (EPA's) Science Advisory Committee on Chemicals (SACC) and the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Scientific Advisory Panel (SAP).

It has come to our attention that, when speaking in your personal capacity, you sometimes refer with ambiguity to your position as an SGE. While it is permissible to reference your position as an EPA SGE in certain contexts, please be mindful of the limitations.

In consultation with EPA's Ethics Office, I am taking this opportunity to clarify how you may refer to your SGE status when speaking in your personal capacity to comply with the federal ethics laws and regulations that apply to you while serving as an SGE. Pursuant to the Standards of Ethical Conduct for Employees in the Executive Branch, 5 C.F.R. Part 2635, you cannot "use or permit the use of [your] Government position or title or any authority associated with [your] public office *in a manner that can be construed to imply that [EPA] or the Government sanctions or endorses [your] personal activities*" (emphasis added). See 5 C.F.R. § 2635.702(b). When you are teaching, speaking, or writing in your non-EPA or personal capacity, then you "shall not use or permit the use of [your] official title or position to identify [you] in connection with [the] teaching, speaking or writing activity." To be clear, you may refer to your EPA title or position in connection with your personal activity only when it is offered as "one of several biographical details" provided that the EPA position is not given more prominence than other aspects of your professional or academic credentials. See 5 C.F.R. § 2635.807(b).

You may properly refer to your role as an EPA SGE, consulting with the SACC and SAP, for example, on your CV or as part of biographical information included in introductory remarks. You may not, however, use that designation to bolster your personal presentation or specific points contained in any remarks, or imply that the EPA or the federal government endorses your personal views. As an SGE, it is more precise to indicate that you work on an intermittent basis with an EPA Federal Advisory Committee rather than state that you are a "part-time" or "special" EPA employee. Should you include any reference to your EPA SGE position, then you must also include a clear disclaimer that your

presentation is offered in your personal capacity only and is not on behalf of EPA. If you do not mention your EPA SGE position at all, then there is no need for a disclaimer.

We appreciate your attention to the limitations on referring to your EPA SGE position. Please contact me should you have questions.

Sincerely,
Hayley

Hayley Hughes, DrPH, MPH, CSP
Director, Office of Program Support
Deputy Ethics Official, Office of Program Support
Office of Chemical Safety and Pollution Prevention
US Environmental Protection Agency

Desk: 202.564.1116

Email: Hughes.hayley@epa.gov